

**Federal Defenders
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June 20, 2024

By ECF and e-mail

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Luis Paulino, 23 Cr. 600 (LAK)*

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: <i>6/20/24</i>

Dear Judge Kaplan:

I write on consent (Assistant U.S. Attorney Jeffrey Coyle and U.S. Pretrial Services Officer Leo Barrios) to make two requests:

First, I respectfully request that the Court include in the Judgement a recommendation to the Bureau of Prisons that Mr. Paulino participate in its Residential Drug Abuse Treatment Program (RDAP). The program is designed to assist defendants who have a history of substance use successfully reenter the community.

Second: I respectfully request that the Court modify Mr. Paulino's bail in two ways: (1) to permit Mr. Paulino to visit his mother in the Bronx with the pre-approval of Pretrial Services as to the date and time of any such visits; and (2) to permit Mr. Paulino to attend his grandson's "graduation" from first grade on June 24, 2024, which will be held at his grandson's elementary school in the Bronx.

Respectfully submitted,

/s/

Martin S. Cohen
Ass't Federal Defender
Tel.: (212) 417-8737

Cc. Jeffrey Coyle, Esq., by ECF and e-mail
Leo Barrios, U.S. Pretrial Services, by e-mail

SO ORDERED

LEWIS A. KAPLAN, USDJ

*Granted
Lew Kaplan
6/20/24*